



MURIEL GOODE-TRUFANT
Corporation Counsel

**THE CITY OF NEW YORK
LAW DEPARTMENT**

100 CHURCH STREET
NEW YORK, NY 10007

SONYA GIDUMAL CHAZIN
Senior Counsel
Labor & Employment Law Division
(212) 356-0890
schazin@law.nyc.gov

May 12, 2025

VIA ECF

Honorable Kiyo A. Matsumoto
United States District Judge
Eastern District of New York
225 Cadman Plaza East, Room S905
Brooklyn, New York 11201

Re: Zapantis-Dalamakis v. City of New York, et al.
24 Civ. 4631 (KAM)(JRC)

Dear Judge Matsumoto:

I am an Assistant Corporation Counsel in the Office of the Muriel Goode-Trufant, Corporation Counsel of the City of New York, assigned to represent Defendants in the above-referenced matter. I write today to inform the Court that the City intends to file a Motion to Dismiss the Plaintiff's Amended Complaint ("FAC") in this matter.

Parties have jointly agreed to the following schedule:

- i) Defendants' Motion due May 28, 2025;
- ii) Plaintiffs' Opposition due June 27, 2025; and
- iii) Defendants' Reply due July 11, 2025.

Additionally, Defendants continue to request a stay of discovery pending the disposition of their motion to dismiss the FAC. Thank you for your consideration in this matter.

Respectfully submitted,

Sonya Gidumal Chazin
Assistant Corporation Counsel

cc: All counsel of record (Via ECF)